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March 6, 2022, 2022

P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007
Via ECF

Re: *United States v. Serhan*, 19 Cr. 764 (PKC)

Dear Judge Castel:

Please accept this letter as an application, with government consent, for an order continuing the status conference, currently scheduled for March 8, 2022, to any date convenient to the court during the week of June 6, 2022, and further ordering a motion schedule as suggested below.

The current posture of the case obviates the need for the conference at this time. Mr. Serhan has been provided with substantial discovery which he has been reviewing. We had dispatched the defense Spanish speaking paralegal to visit Mr. Serhan at the MDC to go over sensitive discovery and review significant portions of recordings and compare them to transcripts. This process has been interrupted by disruption of MDC personal visits. We continue explore negotiations with the government.

The parties respectfully suggest a motion schedule as follows. The defense shall file motions, if any, within forty five days from the date this letter is published via ECF, and the government shall file a response within thirty days from receipt of the defense motion. The defense consents to the exclusion of time until the date of the next conference.

If this application is agreeable to the Court, may I impose upon Your Honor to “so order” this letter and have Chambers publish it via ECF. Thank you for your consideration. I remain

Respectfully
S/GRGoltzer
George R. Goltzer

cc: All parties via ECF

A recent disclosure by the government has created the opportunity for the defense to commence negotiations toward possible settlement of this case short of trial, negotiations which the defense would start before the proposed March date.

If this is agreeable, may I impose upon Your Honor to have this letter “so ordered” and published via ECF. Thank you for your consideration. I remain,

Respectfully,
s/GRGoltzer
George R. Goltzer

cc: All parties via ECF
GRG/ms

The Conference set for March 8, 2022 is adjourned on the application of the defendant to June 14, 2022 at 11 a.m. in Courtroom 11D. Any defense motion shall be filed within forty-five (45) days of this Order or it will be deemed waived; the government shall respond to any defense motion within thirty (30) days of filing.

I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. My reasons for this finding are that the grant of the continuance is needed to permit the parties to review discovery, evaluate whether any motions should be made and conduct potential plea negotiations. Accordingly, the time between today and June 14, 2022 is excluded.

SO ORDERED.

Dated: New York, NY
03/07/2022


P. Kevin Castel
United States District Judge